

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE

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Public Affairs Office U.S. Army Environmental Command Building E4460 5179 Hoadley Road Attention IIMAE-PA Aberdeen Proving Ground, MD 21010-5401

Dear Sir/Madam:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the Environmental Protection Agency (EPA) has reviewed the U.S. Army's Draft Programmatic Environmental Impact Statement (PEIS) for Army Growth and Force Structure Realignment, (CEQ# 20070365).

The 2002 Record of Decision for the PEIS for Army Transformation documented its need and the beginning of its 30 year process to shift from a Cold War focus to meet new unconventional threats to national security. As part of the overall transformation effort, the Army has transitioned to a modular or standardized force structure. This has resulted in the transition of the Army from large, fixed organizations at the Division level to an Army designed around small, standardized self-contained, rapidly deployable Brigade Combat Teams (BCTs). The transformation has also been influenced by other initiative such as the Global Defense Posture Realignment (GDPR). GDPR directives provide guidance to restructure the military for rapid deployment from within the United States (U.S.) while reducing the presence and reliance of U.S. forces on foreign nations.

The purpose of this PEIS is to analyze alternatives to realign the Army's force structure in accordance with Army Transformation objectives and field a force which is of sufficient size and configuration to meet the nation's current and projected future security and defense requirements. In an effort to meet these requirements, the PEIS is focusing on three primary areas of need for growth and realignment. They include: 1) supporting increased security and defense mission requirements; 2) sustaining force readiness; and 3) preserving soldier and family quality of life and the all volunteer force. The Army proposes to address these areas by permanently increasing its end strength and realign its force structure from Fiscal Year 2008 through Fiscal Year 2013. The draft PEIS includes the initial analysis of installations, examining their capacity to accommodate different types and combinations of new units and the potential environmental and socioeconomic impacts of stationing actions as part of the Army's growth and restructuring.

In addition to the no action alternative, alternatives analyzed in the draft PEIS include: 1) implementing Army force structure modifications between fiscal years 2008 and 2013 to support the Army's Modular transformation and GDPR decisions; 2) executing those actions discussed as part of Alternative 1 and, in addition, adding approximately 30,000 Combat Support and Combat Service Support Soldiers to the active and reserve components of the Army to address critical shortfalls in high demand military skills; and 3) executing those actions proposed in Alternatives 1 and 2 and, in addition, grow the Army by up to 6 active duty BCTs at existing or newly established Army stationing locations within the continental U.S.

Seventeen installations capable of supporting the Army's growth and realignment were evaluated for their ability to support the three action alternatives above. They include: Fort Benning, GA; Fort Bragg, NC; Fort Bliss, TX; Fort Campbell, KY; Fort Carson, CO; Fort Drum, NY; Fort Hood, TX; Fort Hunter-Liggett, CA; Fort Irwin, CA; Fort Knox, KY; Fort Lewis, WA; Fort Polk, LA; Fort Riley, KS; Fort Stewart, GA; White Sands Missile Range, NM; Yakima Training Center, WA; and Yuma Proving Grounds, AZ. Each of these installations could receive 1,000 or more additional soldiers as part of alternatives being examined.

The draft PEIS analyzes potential environmental impacts associated stationing actions that include analysis of specific actions such as the construction of housing and quality of life facilities, the construction of new training ranges and infrastructure, and changes in the intensity of use of maneuver land and firing ranges. Specifically, the draft EIS analyzes potential impacts associated with water and cultural resources, noise, wetlands, soil erosion and traffic and transportation. It also identifies areas that would require additional analysis, consultation or permitting actions and other activities required to avoid, minimize, or reduce impacts to these areas. EPA supports the Army's evaluation of these areas. However, EPA suggests that the final PEIS incorporates the use of less toxic munitions in each stationing action where feasible.

Based on the above information, we have no objections to the proposed action and have rated the draft PEIS Lack of Objections (LO).

We appreciate the opportunity to review this draft PEIS. We look forward to reviewing the final PEIS related to this project. The staff contact for the review is Marthea Rountree and she can be reached at (202) 564-7141.

Sincerely,

Anne Norton Miller

Director

Office of Federal Activities